

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EUCLIDES SOTO, LOUIS A. MARTINEZ,
JOSE RAMIREZ, CLEMENTE HERNANDEZ,
CESAR PIZARO, ELISON PENA,
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,
ANGEL BAEZ, ANTONIO MARTINEZ,
WILFREDO ORTIZ, EULOGIO ORTIZ,
MIRRAIN MIRANDA, RAFAEL MORENO,
NELSON ACEVEDO, and
RAMON RODRIQUEZ,

Plaintiffs,

v.

SHERMAN-FEINBERG CORPORATION,
FARNSWORTH FIBRE CORPORATION,
UNITED STEELWORKERS OF AMERICA,
LOCAL 421-U, and UNITED STEELWORKERS
OF AMERICA,

Defendants.

Civil Action No.
04-10892-JLT

ASSENTED-TO JOINT MOTION FOR A CONTINUANCE

The Plaintiffs and Union Defendants hereby move for a continuance of trial in this matter, currently scheduled by order of the Court for December 12, 2005.

As grounds for this motion, the parties state that Counsel for both the Plaintiffs and the Union have considerable scheduling conflicts on the scheduled trial date, including Attorney Diaz's trip outside the country with his family. In addition, Attorney Berger is representing an incarcerated defendant in a jury trial in state court on December 12, 2005, with a risk of substantial incarceration. Moreover, a continuance would be necessary to accommodate a final pretrial conference, which the parties have moved for this date.

In this regard, the trial could be continued until the week of January 23, 2006, or alternatively, the week of March 13, 2006, or at another time agreeable to the parties and convenient to the Court.

Pursuant to Local Rule 7.1, the undersigned counsel for the Union Defendants conferred with counsel for the Corporate Defendants, who has assented to this motion.

WHEREFORE, the parties respectfully request that the Court continue the above-referenced case until after the parties can confer on a trial date, or in any event, to a date certain following a final pretrial conference.

Respectfully submitted,

Dated: November 28, 2005

s/Alfred Gordon
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CERTIFICATE OF SERVICE

I hereby certify that, in addition to being electronically filed, a true copy of the above document was served by first class mail, postage prepaid on the attorney of record for each party on November 28, 2005.

s/Alfred Gordon

Alfred Gordon